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September 19, 1980

Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Comments on NUREG 0696

We have reviewed the Draft Report of NUREG 0696, Functional Criteria for Emergency Response Facilities, and wish to make the following comments.

1. General - The document would be improved if repetition of the same requirements was minimized.
2. General - The document should be expanded to provide guidance to multiple unit sites.
3. Page 5; D, The second paragraph is not clear regarding the intent. It can be interpreted to say that the SPDS, TSC, etc. shall be designed to include capability for periodic testing of the input components. We believe this paragraph is intended to provide for capability to test for accuracy and operability of the instruments associated only with the particular support facility or system.
4. Page 7; C, The requirement that the SPDS be compatible with existing space in the control area and readable from five different operating stations is not practical. Control room space is generally at a premium. We suggest the SPDS be readable to the shift supervisor and senior reactor operator.
5. Page 10; B. Approximately two minutes walking time seems arbitrary. We suggest the intended goal for this criteria be stated instead. What is gained in two minutes rather than three or four, or more? The logical question regarding the habitability of the passageway between the Control Room and TSC is not addressed, but should be.

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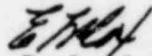
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6. Page 13; H. The design goal of .001 reliability stated on page 8 is not the same as a unavailability goal of .001. We do not understand the need for a unavailability of .001 when the unit is shut down; allowing for maintenance during outages could reduce unavailability to below .001.
7. Page 13; I. The limitation on transmitting the signals through the plant process computer should be deleted. The station may have several process computers any one of which may serve to meet the requirements. For example there may be an advantage to routing processed data from highly reliable radiation or meteorological computer based systems.
8. Page 21; B.6. the word "all" in line four should be replaced by "applicable".

We appreciate your consideration of these comments.

Very truly yours,

BLACK & VEATCH



E. L. Cox

Director of Nuclear Licensing

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